

APII Targets and Needs Addressed

Process Target 1: By December 2004, define a process which ensures that regulated facilities will be covered under just one primary compliance document. By December 2005, complete development and begin implementation.

Needs:

- Permit system needs to be able to respond to businesses' need to modify processes quickly in response to the market or to resolve manufacturing problems.
- Need better interface between the construction permit/operation permit to ensure all requirements are in one document.
- NSR permits that are issued need to be more complete documents. Construction and operation permits need to be better integrated.

Process Target 2: By December 2005, develop, document, communicate, and manage an updated, consistent, and accurate process for issuing, renewing, and revising permits. Incorporate procedures for any new regulatory approaches into the process. Update procedures regularly.

Needs:

- Issue permits in a more timely manner – 2 weeks (simple) to 6 months (complex) – and with more certainty to the time frame.
- Simplify the regulations (inconsistent permit writing and the extraordinary long processing times are directly related to the complexity of the rules).
- Better consistency among different permit writers and less differences of interpretation between permit writers and inspectors (no matter where they are located in the state).
- Simplify the application process.
- Getting to a complete application needs to be a shorter, easier, and more understandable process.
- The permit process needs to be tighter – no errors in draft permits, no surprise conditions, eliminate rechecking/recalculating.
- Air IT systems need to eliminate redundant data, have consistent information about a facility, and be able to “talk to each other”.
- Managers need to spend time on permitting/compliance areas that need their support and not on areas that they understand or feel more comfortable with.
- Better administrative support is needed for the permits process to be efficient and effective.
- Permit writers need a permit process that works effectively and efficiently for them so that they can issue good permits in a timely manner.
- Permit software needs to be easy for permit writers to use.
- Central Office construction permit writers need to be more responsive to the operation permit writers' needs.
- Make record keeping requirements in the permit more reasonable.
- Improve coordination between EPA and DNR.
- The current NR445 and MACT rules need a variety of modifications to shorten the time needed to write the permit.

Process Target 3: Answer questions on permit process and permit policy quickly and accurately resulting in a consistent statewide program providing certainty to staff, permittees, and the public.

Needs:

- Simplify the regulations (inconsistent permit writing and the extraordinary long processing times are directly related to the complexity of the rules).
- Better consistency among different permit writers and less differences of interpretation between permit writers and inspectors (no matter where they are located in the state).
- Permit system needs to be able to respond to businesses' need to modify processes quickly in response to the market or to resolve manufacturing problems.
- Getting to a complete application needs to be a shorter, easier, and more understandable process.

- Provide better guidance and notification regarding reporting requirements during the life of the permit.
- Air IT systems need to eliminate redundant data, have consistent information about a facility, and be able to “talk to each other”.

Process Target 4: Make 100% of permit decisions according to deadlines specified in 2003 WI Act 118.

Needs:

- Issue permits in a more timely manner – 2 weeks (simple) to 6 months (complex) – and with more certainty to the time frame.
- Getting to a complete application needs to be a shorter, easier, and more understandable process.
- Permit system needs to be able to respond to businesses’ need to modify processes quickly in response to the market or to resolve manufacturing problems.
- Permit writers need a permit process that works effectively and efficiently for them so that they can issue good permits in a timely manner.
- The current NR445 and MACT rules need a variety of modifications to shorten the time needed to write the permit.
- Preliminary Determination documents are a good straining tool, speed up renewals, speed up incorporating construction permits into operation permits, and make it easier to do similar facilities.

Customer Service Target 1: Track key events of permit applications in “real time”. By December 2004, make event tracking and support documents available on the Department’s website in a timely manner for all customers. By June 2006, the Air Program will be able to receive and process applications electronically.

Needs:

- Provide clear, understandable, and comprehensive guidance through the Internet, through guidelines, and through interpersonal help.
- Applicants need to know where their application is in the process.
- The DNR website needs to be structured better and be more useful.

Customer Service Target 2: By July 2005, the Air Program will develop a partnership among the public, business, EPA and internal staff related to the function of permitting and the role of the Department. All parties are aware of how to participate in the permit and permit rule-making processes in a meaningful way.

Needs:

- DNR needs to be a partner with business – needs to understand how business operates – it is difficult for a facility to compete and make changes when we have such a structured, rigorous, bureaucratic system and it takes so long for these things to make it through.
- Permits should be written in simple language, not be redundant, and easy to understand.
- Applicants need a better understanding of when a permit is required and what they need to do to get one.
- The public comment period rarely elicits comments.
- The public is not confident of their abilities to influence the permit process in a meaningful way.
- The comment period is an important venue for public participation.
- Public notices need to be structured to better encourage public participation.
- A concurrent public comment period with the EPA review period is needed. Public comment on permits is rare.
- Improved public access to information and earlier entry to the process would enhance public participation.
- The DNR website needs to be structured better and be more useful.
- Businesses need the ability to respond to rapidly changing markets and the permit process needs to support that.
- Companies should be able to trust DNR and not fear reprisals.

- Economic Development Specialists can provide information to businesses on air permitting if DNR provides them with meaningful information that includes contacts they can count on.
- Need better/more frequent communication between permit writer and applicant during the permit process.

Customer Service Target 3: By July 2005, the Air Program will develop methods to ensure that businesses and interested parties have a clear understanding of the content of primary compliance documents; how facilities demonstrate compliance; and how to effectively resolve conflicts with the Air Program.

Needs:

- Permits should be written in simple language, not be redundant, and easy to understand.
- Need a process for conflict resolution between staff and applicant.
- Applicants need a better understanding of when a permit is required and what they need to do to get one.
- Businesses need the ability to respond to rapidly changing markets and the permit process needs to support that.
- Companies should be able to trust DNR and not fear reprisals.

Environmental Target 1: The Air Program sets data driven environmental goals and outcomes. By June 2005, demonstrate how the primary compliance document aids in meeting these goals and outcomes by fostering compliance, promoting improved environmental performance, and rewarding businesses that go beyond compliance.

Needs:

- There needs to be a better tie between permit requirements and their benefit to the environment.
- Wisconsin's rules are more restrictive than those in other states. There is an uneven playing field across the U.S.
- In some cases where Wisconsin is more stringent it applies to record keeping and not emission rates. DO these additional requirements add any environmental improvements?

Environmental Target 2: By July 2005, provide data on the web, which shows the relationship between local air pollution levels and public health. This will be continually evaluated and updated.

Needs:

- Improved public access to information and earlier entry to the process would enhance public participation.
- The DNR website needs to be structured better and be more useful.
- There needs to be a better tie between permit requirements and their benefit to the environment.

Financial Target 1: By June 2006, reduce the hours spent per permit review, renewal, and revision by 20-40% each, while providing equal or better environmental protection.

Needs:

- Issue permits in a more timely manner – 2 weeks (simple) to 6 months (complex) – and with more certainty to the time frame.
- Simplify the regulations (inconsistent permit writing and the extraordinary long processing times are directly related to the complexity of the rules).
- Permit system needs to be able to respond to businesses' need to modify processes quickly in response to the market or to resolve manufacturing problems.
- The permits process needs to be tighter – no errors in draft permits, no surprise conditions, eliminate rechecking/recalculating.
- Effort and resources spent on correcting/completing/refining information are disproportionate to benefits.
- Need to reduce transactional costs for construction permits (consultant fees and permit fees). Transactional costs increase the length of time it takes to get a permit.

- The current NR 445 and MACT rules need a variety of modifications to shorten the time needed to write the permit.
- Permit writers need a permit process that works effectively and efficiently for them so that they can issue good permits in a timely manner.
- Air IT systems need to eliminate redundant data, have consistent information about a facility, and be able to “talk to each other”.

Financial Target 2: By June 2006, reduce by 40-50% the need to revise or modify permits. This could be accomplished by: sharing draft permits; incorporating flexibility; utilizing, modifying, or expanding exemptions; offering alternatives; or refining existing regulations. Evaluate the results of these strategies to ensure that they are consistent with our environmental and public input goals.

Needs:

- Simplify the regulations (inconsistent permit writing and the extraordinary long processing times are directly related to the complexity of the rules).
- Air IT systems need to eliminate redundant data, have consistent information about a facility, and be able to “talk to each other”.
- Permit writers need a permit process that works effectively and efficiently for them so that they can issue good permits in a timely manner.
- Effort and resources spent on correcting/completing/refining information are disproportionate to benefits.
- The permits process needs to be tighter – no errors in draft permits, no surprise conditions, eliminate rechecking/recalculating.
- There needs to be alternative approaches to use in addition to the current permit process.
- There needs to be a better tie between permit requirements and their benefit to the environment.
- Improved public access to information and earlier entry to the process would enhance public participation.
- DNR needs to be a partner with business – needs to understand how business operates – it is difficult for a facility to compete and make changes when we have such a structured, rigorous, bureaucratic system and it takes so long for these things to make it through.

Financial Target 3: Continue allocating resources in alignment with funding constraints, to support program priorities and customer needs.

Needs:

- Effort and resources spent on correcting/completing/refining information are disproportionate to benefits.
- The DNR website needs to be structured better and be more useful.
- Improve coordination between EPA and DNR.

Innovation and Learning Target 1: By February 2005, define the skill sets and organizational culture needed for staff and managers to work effectively and consistently with permits and other regulatory strategies. By December 2005, ensure that staff and managers have and maintain the skills defined.

Needs:

- Permit/Compliance staff needs to have a better understanding of cutting-edge technologies used by business.
- Air staff needs to help business understand how they can meet Wisconsin’s environmental standards.
- Permit writers believe a well-developed permit should not need to be revised right away. Writers believe senior management views a successful permit as a permit that is out-the-door. This can lead to time-consuming multiple revisions in the near future.
- There needs to be a shared vision among managers, permit drafters, and compliance staff as to the roles and importance of construction permits, operation permits, and compliance.
- Managers need to spend time on permitting/compliance areas that need their support and not solely on areas that they understand or feel more comfortable with.

- Better administrative support is needed for the permits process to be efficient and effective.
- Permit writers/managers need to be held accountable so that other people don't have to pick up the pieces.
- The Air Management Team needs to take seriously permit drafter input regarding policy changes and work priorities.
- Permit software needs to be easy for permit writers to use.
- Central office construction permit writers need to be more responsive to the operation permit writers' needs.
- Good permit writing needs to be rewarded.
- Guidance for permit writers needs to be up to date, accurate, and easy to locate.
- Supervisor's roles in permit review need to be well defined and understood. Supervisors need to be trained to carry out these roles properly.
- Good mentoring and peer review should be encouraged.
- Supervisors with permit writing experience are very helpful to permit writers.

Innovation and Learning Target 2: By June 2006, the Air Program will have available a registration permit program and at least two or more other regulatory alternatives to traditional permitting for qualifying sources. Such alternatives provide equal or better environmental protection and opportunity for public input.

Needs:

- There needs to be alternative approaches to use in addition to the current permit process.

Innovation and Learning Target 3: Whenever a new permit or regulatory strategy is developed or updated, the Air Program actively works with partners to ensure there is communication, opportunity for input, and an appropriate level of education.

Needs:

- Air staff needs to help business understand how they can meet Wisconsin's environmental standards.
- Air permitting is less understood, with a sense of less control, by those outside the DNR. This includes business, the public, local government, and economic developers.
- DNR needs to be a partner with business – needs to understand how business operates – it is difficult for a facility to compete and make changes when we have such a structured, rigorous, bureaucratic system and it takes so long for these things to make it through.
- Provide clear, understandable, and comprehensive guidance through the Internet, through guidelines, and through interpersonal help.
- Permits should be written in simple language, not be redundant, and easy to understand.
- Provide better guidance and notification regarding reporting requirements during the life of the permit.
- Applicants need a better understanding of when a permit is required and what they need to do to get one.
- The public comment period rarely elicits comments.
- The public is not confident in their ability to influence the permit process in a meaningful way.
- The comment period is an important venue for public participation.
- Public notices need to be structured to better encourage public participation.
- Improved public access and earlier entry to the process would enhance public participation.
- The DNR website needs to be structured better and be more useful.
- Businesses need the ability to respond to rapidly changing markets and the permits process needs to support that.
- Economic Development Specialists can provide information to businesses on air permitting if the DNR provides them with meaningful information that includes contacts they can count on.
- Need better/more frequent communication between permit writer and applicant during the permit process.